

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

BENTLEY GERALD HATCHETT,

Defendant.

**PROTECTIVE ORDER**

**13 Cr. 634 (LTS)**

Upon the application of the United States of America, Geoffrey S. Berman, United States Attorney for the Southern District of New York, Assistant United States Attorneys Jacob R. Fiddelman and Brett Kalikow, of counsel, for an order limiting the dissemination of any and all discovery produced in connection with the above-captioned case (the “Discovery”), which contains sensitive information of third parties, it is hereby ORDERED that:

(1) Discovery shall not be disclosed by the defendant or defense counsel, including any successor counsel (“defense counsel”) other than as set forth herein, and shall be used by defense counsel and the defendant solely for the purpose of defending this criminal action;

(2) the defendant and defense counsel are precluded from disseminating the disks containing the Discovery, and any and all printouts and/or digital versions of the Discovery (and any copies and/or screenshots) to anyone beyond the defendant, defense counsel, investigative, secretarial, clerical, and paralegal personnel employed full-time or part-time by the defendant’s counsel, independent expert witnesses, investigators, or advisors retained by the defendant’s counsel in connection with this action, and other prospective witnesses and their counsel, to the extent deemed necessary by defense counsel, for hearing or trial preparation, and such other persons as hereafter may be authorized by the Court upon motion by the defendant;

(3) the defendant and defense counsel are precluded from using any disks containing the Discovery, and any and all printouts and/or digital versions of the Discovery (or any copies or

screenshots) for any purpose other than hearing or trial preparation in the above-captioned criminal case;

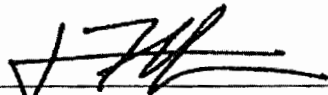
(4) the defendant and defense counsel must destroy or return the disks containing the Discovery, and any and all printouts and/or digital versions of the Discovery (including all copies), at the conclusion of the trial of this matter or when any appeal has terminated and the judgment has become final; and

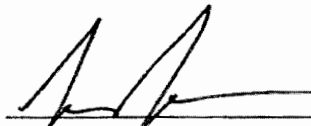
(5) the provisions of this Order shall not terminate at the conclusion of this criminal prosecution, and the Court will retain jurisdiction to enforce this Order following termination of the case.

Dated: New York, New York  
December 4, 2019


GEOFFREY S. BERMAN  
United States Attorney  
for the Southern District of New York

DEFENSE COUNSEL

By:   
\_\_\_\_\_  
Jacob R. Fiddelman  
Brett Kalikow  
Assistant United States Attorneys

By:   
\_\_\_\_\_  
Randolph E. Daar, Esq.  
Geoffrey St. Andrew Stewart, Esq.

SO ORDERED:

 12/5/19  
\_\_\_\_\_  
HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK